

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION

JESSICA HODGES, as natural guardian of)	
minor children, et al.,)	
)	
Plaintiffs,)	
)	
vs.)	Case Number: cv422-067
)	
CHATHAM COUNTY, GEORGIA; et al.,)	
)	
Defendants.)	

AMENDED MOTION FOR LEAVE TO WITHDRAW

COMES NOW the undersigned counsel for Defendants, Chatham County, Georgia, Alfred Nevels, Selena Cardona, Teanna Frances-Henderson, Terence Jackson, Don White, Karlos Manning and Yvette Bethel-Quinney (“County Defendants”) and respectfully request leave for R. Jonathan Hart, Chatham County Attorney, and Andre Pretorius, Assistant County Attorney, to withdraw as counsel of record for Defendants Selena Cardona, Terence Jackson, and Yvette Bethel-Quinney. In support of this motion, the undersigned counsel submit the following:

1. Plaintiff filed the above captioned action in the Superior Court of Chatham County on February 2, 2022 under Civil Action Number SPCV22-00098.
2. On March 24, 2022, the undersigned filed an answer on behalf of County Defendants.
3. A Notice of Removal was filed in this Court on March 24, 2022 (Doc 8).

4. On June 9, 2022, attorneys Benjamin Perkins and Brian D. Griffin, of the law firm Oliver Maner, LLP filed a notice of entry of appearance on behalf of Defendants Selena Cardona, Terence Jackson, and Yvette Bethel-Quinney (Doc 29).
5. Attorneys Hart and Pretorius sent Defendants a letter informing them of their intention to withdraw via email and certified mail on June 15, 2022. A copy of the letters are attached as **Exhibit A**.
6. Attorneys Hart and Pretorius's withdrawal as counsel will not have a material adverse effect on Defendants as Defendants will continue to be represented by attorneys Perkins and Griffin, nor will the withdrawal delay the case.
7. Attorneys Hart and Pretorius will continue to represent Defendants Chatham County, Georgia, Alfred Nevels, Teanna Frances-Henderson, Don White, and Karlos Manning in this matter.
8. A proposed order granting the relief sought is attached.

WHEREFORE, the undersigned counsel respectfully requests that attorneys Hart and Martin be permitted to withdraw as counsel for Defendants Selena Cardona, Terence Jackson and Yvette Bethel-Quinney in this matter. The Clerk's office is requested to make such changes to the docket and to the electronic notification system as necessary to reflect this withdrawal.

This 29th day of June, 2022.

/s/ R. Jonathan Hart

R. Jonathan Hart

County Attorney

State Bar No. 333692

/s/ Andre Pretorius

Andre Pretorius

Assistant County Attorney

State Bar No. 298154

Attorneys for Chatham County, Georgia;

Alfred Nevels, Teanna Frances-Henderson,

Don White, and Karlos Manning

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IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION

JESSICA HODGES, as natural guardian of)
minor children, et al.,)

Plaintiffs,)

vs.)

Case No: 4:22-cv-00067

CHATHAM COUNTY, GEORGIA; et al.,)

Defendants.)

CERTIFICATE OF SERVICE

This is to certify that I have this day caused electronic notification of filing and service of the foregoing Amended Motion to Withdraw as Counsel upon all counsel of record for the parties by filing the same via the Court's CM/ECF System.

This 29th day of June, 2022.

/s/ R. Jonathan Hart

R. Jonathan Hart

Georgia Bar No. 333692

Attorney for Chatham County, Georgia;

Alfred Nevels, Teanna Frances-Henderson,

Don White, and Karlos Manning

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